

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
Watson Grinding and Manufacturing Co.,	§	Case No. 20-30967
	§	(Joint Administration Pending)
Debtor.	§	

In re:	§	Chapter 11
	§	
Watson Valve Services, Inc.,	§	Case No. 20-30968
	§	(Joint Administration Pending)
Debtor.	§	

**TCEQ STATEMENT OF ANTICIPATED TIMELINE FOR REMOVAL OF
PROPYLENE AND OTHER CHEMICALS AND GASES FROM THE WATSON SITE**

In response to the Texas Commission on Environmental Quality's (the "TCEQ") *Emergency Motion for Preliminary Injunction Restricting Access to the Debtors' Facility Pending Entry of a Court Order Setting Forth Protocols Regarding Safe Access*, this Court directed TCEQ to file a pleading by 3:00 p.m. on Tuesday, February 18, 2020, informing the Debtors and other interested parties of the anticipated timeline moving forward. As noted by one of the other parties at the hearing, removal of pressurized propylene requires specific steps and procedures. In order to protect the human health and environment, TCEQ sought to exclude all other parties from the location, except for the federal government.

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Based upon the information provided by TCEQ's Critical Infrastructure Division, the undersigned represents to the Court the following anticipated timeline:

1. On February 18th, TCEQ's Emergency Response Team surveyed site and documented inventory.
2. On February 18, TCEQ Critical Infrastructure contacted vendor who will be on-site on February 19, 2020.
3. Phase I: TCEQ and its vendors will use the next 3-5 days to assess the site and determine what condition valves are in, find the correct containers to transfer the gasses and/or chemicals into, among other things.
4. After the assessment is complete and proper containers are obtained, the TCEQ will start removing the remaining chemicals/gasses from the site.
5. Assessment of the site will include identifying the type of chromium on the ground, and the proper method to handle.
6. TCEQ requests that the Debtor provide all Safety Data Sheets in order to help move along our processes.
7. The above process is anticipated to take at best 10 days, and at worst, 14 days to complete.
8. Phase II: Argon Tank & Evidence
9. In an attempt to reach a consensus with Debtors' attorneys and a counsel for a plaintiff, regarding the pipeline siting atop and at the bottom of the Argon tank, the TCEQ will agree to coordinate with Debtors' counsel and Plaintiff's counsel so that, after Phase 1 is complete, TCEQ and independent third-parties of the Debtor and Plaintiff may visit the site. During this visit, TCEQ will allow the Parties to observe the pipeline as it

currently sits, and TCEQ will bisect a section of the pipeline to be tagged and kept by the Debtor as evidence.

10. Thereafter, TCEQ will move forward with clearing the debris from the Argon tank, in order to drain it and assure safety.

The above Anticipated Phase 1 and 2 Timelines are just that- anticipated. TCEQ will update the Court and Interested Parties if there are material changes to this proposed plan.

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Respectfully submitted,

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ATTORNEYS FOR THE TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served via the Court's Electronic Filing System on all parties requesting notice in this proceeding and via electronic mail on the parties listed on the attached service list.

/s/ Abigail Ryan